

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

ORDER

AND NOW, this day of , 2025, it is hereby ORDERED that Defendant's Motion To Extend Deadlines For Trial in the above captioned matter is hereby GRANTED.

BY THE COURT:

J.

R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
Attorney I.D. No. 86894
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Jenkintown, PA 19046
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**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

DEFENDANT, DONALD MICHAEL'S MOTION TO CONTINUE TRIAL

TO THE HONORABLE JUDGE MARK A. KEARNEY:

AND NOW, Defendant, Donald Michael, by and through his attorney,

R. Emmett Madden, Esquire, hereby submits this Motion to Continue Trial for 30 days and avers the following:

1. On July 18, 2024, the government sealed a 4-count Indictment charging Defendant Donald Michael with Conspiracy to Manufacture Child Pornography and other related charges.

2. Mr. Michael is charged in that Indictment with the following: Count One Conspiracy to Manufacture Child Pornography, Conspiracy to Receive and Distribute Child Pornography, Receipt of Child Pornography and Distribution and Attempted Distribution of Child Pornography.

3. Mr. Michael is charged with similar charges in Federal Court in Arizona.
4. On August 27, 2024, R. Emmett Madden, Esquire entered his appearance to represent Mr. Michael.
5. Pretrial Motions are due February 28, 2025.
6. Trial is scheduled for Tuesday, March 11, 2025, at 9:00 A.M., in Courtroom 6B, United States Courthouse, 601 Market Street, in Philadelphia Pennsylvania.
7. This is an extremely serious matter where defendant faces a lengthy period of imprisonment in two different jurisdictions.
8. Counsel is currently attempting to resolve Defendant's two very serious cases in the Eastern District of Pennsylvania and the District of Arizona.
9. Counsel needs an additional 30 days to finalize plea negotiations and submit proper paperwork to the Federal Court.
10. Counsel is requesting to continue Trial for 30 days.
11. Defendant acknowledges and waives his speeding trial rights.
12. Assistant United States Attorney Michelle Rotella is unopposed to the extension request.

WHEREFORE, Defendant respectfully requests the Motion to Continue Trial is Granted.

Date: 02/25/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, R. Emmett Madden, Esquire, hereby certify that, on this date, I have served a copy of the attached Defendant's Motion To Continue Trial, upon the following by electronic mail:

The Honorable Mark A. Kearney
United States District Court
Eastern District Court of Pennsylvania
6613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Via Email

AUSA Michelle Rotella
United States Attorney's Office
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106
Via Email

Date: 02/25/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
Attorney I.D. No. 86894
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Attorney for Defendant